



Citizen Information

Citizen/Originator: Johnson, Lisa

Organization: Alpha American Company, Yukon Furnaces
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Constituent: N/A

Committee: N/A

Sub-Committee: N/A

Control Information

Control Number: AX-17-000-6709
Status: Pending
Due Date: Apr 10, 2017
Letter Date: Mar 24, 2017
Addressee: AD-Administrator
Contact Type: LTR (Letter)
Signature: AD-Administrator
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Received Date: Mar 24, 2017
Addressee Org: EPA
Priority Code: Normal
Signature Date: N/A

Subject: DRF - Small manufacturer of UL Listed multi-fuel and add-on wood furnaces seeks assistance from Administrator, noting their company and others will have to cease production because of impossibility of complying with a new EPA rule that revises the NSPS (New Source Performance Standard) for Residential Wood Heaters Rule starting May 15, 2017.

Instructions: AD-Prepare draft response for the Administrator's signature
Instruction Note: N/A
General Notes: Lisa Johnson, author of incoming email, is UL & EPA Compliance Liaison and Manager of Marketing and Sales for the Alpha American Company, which makes Yukon Furnaces
CC: Kristien Knapp - AO-IO

Lead Information

Lead Author: N/A

Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
Anne Hargrove	OEX	OAR	Mar 27, 2017	Apr 10, 2017	N/A
	Instruction: AD-Prepare draft response for the Administrator's signature				
Barbara Matthews	OAR	OAR-OAQPS	Mar 27, 2017	Apr 5, 2017	N/A
	Instruction: AD-Prepare draft response for the Administrator's signature				

Supporting Information

Supporting Author: N/A

Supporting Assignments:

Assigner	Office	Assignee	Assigned Date
No Record Found			

March 24, 2017 4:51 PM
Scott <Pruitt.Scott@epa.gov>

NSPS New Source Performance Standard for Residential Wood Heaters - the company I work for needs your help

Scott Pruitt,

Congressmen on your new position as the EPA Administrator! Folks here in Northern MN are happy that we finally have a common sense about the feasibility of allowing companies to continue to work and operate their businesses while reaching regulations and protect the environment at the same time. I sure hope you will be able to come to

3 years I have been working for Alpha American Company. This company has been in business since 1970 to help with the production and selling of very well built UL Listed multi-fuel and add-on wood furnaces due to the new rules for our products. The revisions made to the EPA NSPS for Residential Wood Heaters rule (2015) has given our company (QQQQ) only a 2 years period for transition. Note: Forced air furnaces had always been exempt from this rule when it went into effect in 2015. The products that we build (large furnaces – over 65,000btu's) are required to be compliant - which gives us only 50 (or so) more days before this company will be forced to shutter the doors.

Our manufacturing facility is based in a small rural community in north central MN (population of 200 people) and has 8 employees. Since this rule has gone into effect in May of 2015, the amount of employees has gone down and our company profits have gone down at least by 25%!

I am asking you today to ask for your support in Repealing (at the very least offering an Exemption Provision to the rule) the rule to the Title 40 Part 60 pertaining to Residential Wood Heaters in 2015 – although, I personally feel that the rule should be repealed. It is a shame to think that a family (or families), for the past 40 plus years, have put all their money and effort and now will have to let go the employees and shut the doors! Many of the companies, including Alpha American Company, at their 40 year mark of being in business were there to solve this Country's problem of alleviating the high costs of energy for middle class sectors during and after the era of the Arab Oil Embargo. This company, Alpha American Company, decided to consider having the furnaces Tested by UL for Safety, and took the time and money to design what would offer people a choice of heating fuel to burn through one furnace (multi-fuel oil/wood/coal, gas/wood/coal and wood/coal). To be a UL Registered Firm is not a cheap endeavor for any company – there are the product reviews that cost in the 10's of thousands of dollars, there are quarterly inspections that run the company \$1,500.00 per visit. The company also has another \$500 to \$1,000 per Label run (this does not include the cost of the labels – and being that we have 6 different UL Labels). Should the UL Field Inspector find a Variance in Procedure due to a change in procedure that is brought in for production that does not match in our Procedure, that can run \$1,000.00 per Variance.

Alpha American Company, (we) are not against clean air and water, we live in an area that has many lakes, rivers and the water and land that surround our homes. However, I am against an Federal Agency putting Rules and Regulations describing unproven Test Methods without adequately demonstrating BSER (Best Systems of Emissions Reduction) without any data supporting their claims whatsoever. At the time of Public Comments for the Proposed Rule, the EPA considered the input from the industry about transferring technology between wood stoves, wood boilers and wood furnaces. EPA, at the time, just assumed that the technology could be transferred.

seen involved in the grueling processes of becoming compliant and tend to disagree with the fact that the appliances are not adhering to NFPA's rules on installation or operation of wood burning appliances and they are not complying with the recommendations for installation and operation – the labs are using only a part of a Canadian standard to test and there are only but a few products of our type that have been able to pass, which means that by the time Stearns and Sons is around this industry will be virtually gone. Most of the small companies that build solid fuel forced air furnaces were shut down by May 15th of this year and won't get anywhere near passing the 2020 emissions limits.

and Federal Compliance Liaison for Alpha American Company, I can tell you that the EPA compliance costs are a significant element to use in R&D, the cost for testing of several furnace model lines in an EPA Approved Laboratory, the cost for the added cost for keeping records and the cost for annual audits are much more substantial than the costs involved in UL Procedures involving six (6) different furnaces that are Listed as Safe to install and use in your home. Much of the testing that would be conducted by the EPA would be redundant to the UL quarterly audits, therefore, costing our little company a lot of money for compliance.

Stearns and Sons was only given two years to comply to the EPA Rule, which is ludicrous, and it has been proven that two years is not enough to bring six furnaces into compliance. Our company has spent the past two years putting one (1) of our multi-fuel furnaces at our facility and have just recently got the unit to the point where we could have a little confidence that it would pass in a laboratory setting, and I mean a little confidence that we would not be wasting a lot of money and time. That is the reality there that is building this type of product that can survive on offering only one furnace on the market and it is driving all the rest of the products off the market where consumers will have nothing to choose from.

For Residential Wood Heaters, the EPA states that

"The residential wood heaters source category is different from most NSPS source categories in that it is for mass-produced products. Thus, important elements in determining BSE include the significant costs and environmental impact of the models with those systems are designed, tested, field evaluated and certified."

Since the EPA did not quantify "mass-produced" in the Rule, I can ascertain that our manufacturing plant is in no way mass-producing these products. These units are made of heavy steel and take a lot of time to weld, paint and assemble. Since our production in May of 2004 – the most units that went out in one calendar year was 986 units (that is combining all 6 models) when the price of oil sky-rocketed and there was a knee-jerk reaction to the high heating costs. In the years following the high oil prices and higher heating costs, furnace sales went back to normal levels where we built and shipped about 100 units per year. Starting in 2011 and during this great recession period since then, the most furnaces shipped out from our plant was 100 or less. These quantities do not demonstrate "mass-produced residential consumer products" and therefore do not qualify as such.

The EPA has made no provision for manufacturers or end-users alike to apply for any type of Regulatory Relief from this Rule while operating their wood burning appliances under scrutiny of Federal Regulation. There is no provision for Small businesses to apply for Financial Hardship Exemptions, either, which would be good for companies that are located in rural areas where people living in rural areas. The manufacturing sector has taken a hard hit from the recession and now that things are moving forward and there is some stimulation in the economy, we are looking, dismally, I might add, at having to close our long time standing business that has supported a family and many employee families and this is a woman owned business.